UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

FILED 2007 DEC 10 PM 1:26

UNITED STATES OF AMERICA vs. Veronica PARTIDA	Magistrate's Case No. '07 MJ 2865 COMPLAINT FOR VIOLATION OF 21 U.S.C. 952 and 960 Unlawful Importation of a Controlled Substance

The undersigned complainant being duly sworn states:

COUNT ONE

That on or about December 07, 2007, within the Southern District of California, defendant Veronica PARTIDA did knowingly and intentionally import approximately 105 kilograms (231.8 pounds) of marijuana, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Jose L. Ramirez
Signature of Complainant
U.S. Drug Enforcement Administration

Sworn to before me and subscribed in my presence, this 10th day of December, 2007.

United States Magistrate Judge

MIP

PROBABLE CAUSE STATEMENT

I, Jose L. Ramirez, a Special Agent with the U.S. Drug Enforcement Administration (DEA), declare under penalty of perjury, the following is true and correct:

On December 7, 2007, agents of the U.S. Border Patrol arrested Veronica Partida, a known narcotics smuggler in the State Route (SR) 94 Immigration check point. SR 94 is a very popular staging area for both alien and narcotics smuggling.

On December 7, 2007, Smuggling Interdiction Group (SIG), were working in the Brown Field Station area of operation. SIG agents where working SR 94 due to the checkpoint not being operational because of inclement weather. SIG agents observed a white Toyota Camry traveling westbound passing the SR-94 Immigration checkpoint at a high rate of speed for the wet conditions and appeared heavily laden in the rear. Agents Gutierrez and Penagos turned around and began surveillance of the Toyota as it headed towards Otay Lakes Rd and SR 94. Due to the heavy commuter traffic, they lost visual temporarily at the aforementioned intersection and advised Chula Vista Border Patrol station. Within five minutes, Agents Gutierrez and Penagos found the white Toyota matching the description westbund on Otay Lakes RD. The vehicle was still traveling at a high rate of speed and still appeared laden in the rear. Within a few minutes, Agents Santos and Bugarin attempted a vehicle stop on the white Toyota and the Toyota immediately yielded after they activated their clearly marked DHS marked Border Patrol vehicle's fully functioning emergency lights. Agents Santos immediately saw what appeared to be large tightly wrapped bundles indicative of marijuana smuggling. Agent Santos asked Partida if she had anything in the vehicle they should be aware of and Partida answered,"Just some bags". Agents Santos asked Partida what exactly was in the bags to which Partida answered "marijuana". At that time, Agents Santos asked Partida to step out of the vehicle and was placed under arrest. A K-9 was also brought to the scene and the K-9 immediately alerted to the cabin area of the vehicle and the trunk for narcotics. At approximately 11:56 am SA Jose L. Ramirez of the Drug Enforcement Administration responded to the Chula Vista station. SA Ramirez mirandized Partida in the presence of Enrique Penagos, Border Patrol agent. Partida stated she understood her rights and was willing to answer questions without any attorney present. Partida provided a voluntary statement and admitted she was to get paid $1,500 to $2,000.00 for the delivery of the marijuana.

At approximately 2:55 p.m., Partida was transported to the Metropolitan Correction Center in San Diego, California, and booked in to await judicial proceedings.

Executed on December 7 at 5:20pm.

Jose L. Ramirez
Special Agent
U.S. Drug Enforcement Administration

On the basis of the facts presented in this probable cause statement consisting of ~~1~~ 2 pages, I find probable cause to believe that the defendant named in this probable cause statement committed the offense of possessing marijuana with the intent to distribute in violation of **Title 21, United States Code, Section 841 (a)(1).**

United States Magistrate Judge

12/7/07 at 10:34
Date/Time